

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS KINGSLEY  
(POSTCOM/USPS-T-39-12)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for  
Postal Commerce submits the attached interrogatories to USPS witness  
Kingsley: PostCom/USPS-T-39-12.

Respectfully submitted,



Ian D. Volner

N. Frank Wiggins

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Counsel for Association for Postal Commerce

October 15, 2001

**POSTCOM/USPS-T39-12.** Please refer to page 19 of your testimony where you state, "This supports limiting the proposed BPM flats barcode discount and the flat and parcel rate distinction (witness Kiefer, USPS-T-33) to AFSM 100 compatible criteria."

(a) Please list all "AFSM 100 compatible criteria".

(b) In FY 2000, what percentage of Bound Printed Matter pieces met the criteria for AFSM 100 compatibility identified in your response to subpart (a) of this interrogatory? Please also identify and describe the data source that you used to develop this estimate. If you cannot provide a precise estimate, please provide your best guess.

(c) In FY 2000, what percentage of Bound Printed Matter flats met the criteria for AFSM 100 compatibility identified in your response to subpart (a) of this interrogatory? Please also identify and describe the data source that you used to develop this estimate. If you cannot provide a precise estimate, please provide your best guess.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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October 15, 2001